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May 21, 2024

**VIA ECF**

Hon. Gregory H. Woods  
United States District Judge  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Room 2260  
New York, NY 10007

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**MEMORANDUM ENDORSED**

re: **Request for Pre-Motion Conf./Permission to File Motion**  
**Doe v. City of New York et al**  
**EDNY Case No. 1:24-cv-03133-GHW**

Dear Hon. Judge Woods:

This office represents Plaintiff, ABC, in the above-referenced matter. Pursuant to Judge John G. Koeltl's order dated April 22, 2024, which granted Plaintiff leave to file the Complaint under a pseudonym and with necessary redactions, "without prejudice to any rulings by the Judge to whom this case is assigned." I respectfully request a pre-motion conference regarding Plaintiff's intention to file a motion to seal the entire case file.

The current order allows the Complaint to be filed under a pseudonym and with redactions. However, this measure is insufficient to fully protect Plaintiff's identity. Given the nature of the allegations and the sensitive information involved, almost all documents subsequently filed in this case, even if partially redacted, are likely to reveal Plaintiff's identity.


In light of these concerns, we seek Your Honor's permission to file a motion to seal the entire case file, including the motion itself, under seal. Alternatively, we request a pre-motion conference to discuss this matter.

Thank you for your consideration.

Application granted. Plaintiff's request to file a motion to seal, Dkt. No. 4, is granted. Plaintiff is directed to file any motion to seal no later than May 28, 2024. Separately, the Court is evaluating Judge Koeltl's order regarding Plaintiff's use of a pseudonym and related redactions. If Plaintiff wishes to present any supplemental briefing in support of her request to pursue this action under a pseudonym or to permit the redactions authorized by Judge Koeltl's provisional order, such briefing should be included in the same submission due May 28, 2024. The Clerk of Court is directed to terminate the motion pending at Dkt. No. 4.

SO ORDERED.

Dated: May 21, 2024  
New York, New York

  
GREGORY H. WOODS  
United States District Judge

Respectfully submitted,

*s/ Joshua Gittleman, Esq.*